

1 Remarks

2 Amendments to the Claims

3 Claims 1, 11, 18, 21, 22 and 24 have been amended as indicated above.
4 Specifically, each claim 1, 11, 18, 21, 22 and 24 has been amended to clarify the
5 cooperative sequence of steps performed by the recited elements and limitations.
6 Support for the amendments to claims 1, 11, 18, 21, 22 and 24 can be found at least
7 in the Specification at page 6, line 8 to page 18, line 22, and Figures 3-6 of the
8 Drawings, as respectively originally filed. No new matter has been introduced
9 through the amendments to the claims.
10

11 Rejection of Claims under 35 U.S.C. § 102

12 Claim 22 has been rejected under 35 U.S.C. § 102(b) as being anticipated by
13 U.S. Patent No. 5,914,676 ("Akpa").

14 The Applicant respectfully disagrees that claim 22, as amended, is anticipated
15 by Akpa.

16 As a starting point, the PTO and the Federal Circuit provide that §102
17 anticipation requires **each and every element** of the claimed invention to be
18 disclosed in a single prior art reference. (*In re Spada*, 911 F.2d 705, 15 USPQ2d
19 1655 (Fed. Cir. 1990).) The corollary of this rule is that the absence from a cited
20 §102 reference of any claimed element negates the anticipation. (*Kloster*
21 *Speedsteel AB, et al v. Crucible, Inc., et al*, 793 F.2d 1565, 230 USPQ 81 (Fed. Cir.
22 1986).) Furthermore, **"[a]nticipation requires that all of the elements and**
23 **limitations of the claims are found within a single prior art reference."** (*Scripps*
24 *Clinic and Research Found. v Genetech. Inc.*, 927 F.2d 1565, 1576, 18 U.S.P.Q.2d
25 1001, 1010 (Fed. Cir. 1991 (emphasis added).) Moreover, the PTO and the Federal
Circuit provide that §102 anticipation requires that there must be no difference

1 between the claimed invention and the reference disclosure. (*Scripps Clinic and*
2 *Research Found. v. Genetech, Inc.*, id. (emphasis added).)

3 Accordingly, if the Applicant can demonstrate that any one element or
4 limitation in claim 22 (as amended) is not disclosed by Akpa, then the claim must be
5 allowed.

6
7 Claim 22

8 In regard to claim 22 (as amended), that claim includes the following features
9 and limitations:

10
11 A document processing apparatus, comprising:

12 a single display;

13 a plurality of user-accessible input points configured to generate
14 input point signals in response to being accessed by a user, wherein
15 the display is distinct from any of the plurality of user-accessible input
16 points;

17 an electronic readable memory device comprising descriptions
18 of selected ones of the plurality of user-accessible input points in a
19 plurality of languages;

20 a processor configured to associate an input point signal from
21 an input point with a corresponding description of the input point in a
22 preselected one of the plurality of languages and to display the
23 description on the display for a preselected time;

24 [...],

25 and wherein the processor is further configured to perform the
association in response to the input point signal.

(Emphasis added).

1 Akpa fails to provide a plurality of **user-accessible input points** configured to
2 **generate input point signals** in response to being **accessed by a user**, and a
3 processor configured to associate an **input point signal** from an input point with a
4 **corresponding description** of the input point in a preselected one of the plurality of
5 languages and to **display the description** on the display, and wherein the
6 processor is further configured to perform the association **in response to the input**
7 **point signal**, as recited in combination with the other features and limitations of
8 claim 22, as amended.

9 It is important to note that the elements and limitations recited by instant claim
10 22, as amended, are respectively and cooperatively configured to perform the
11 following usage sequence, in order:

- 12 1) a user accesses (e.g., presses, actuates, etc.) an input point;
- 13 2) that input point generates an input point signal in response to being user
14 accessed;
- 15 3) the processor associates that input point signal with a corresponding
16 description; and
- 17 4) that corresponding description is displayed on the display.

18 Thus, under instant claim 22 (as amended), user access of a particular input
19 point is **required prior to** the display of the corresponding description for that input
20 point.

21 In contrast, Akpa provides for displaying changeable labels on each of a
22 plurality of keys (32-42), wherein each key (32-42) includes a respective LCD screen
23 (56) (Col. 2, lines 35-40 of Akpa). In the alternative, Akpa provides for a single "L"-
24 shaped LCD screen (30) that underlies a switch panel defining an X-Y grid, wherein
25 the LCD screen displays (i.e., simulates) a plurality of individually labeled "keys" (32-
42) (Col. 3, lines 38-50; Fig. 2 of Akpa). In all cases and embodiments, Akpa is
directed to **simultaneously displaying** all of the respectively changeable **key labels** to

1 the user - regardless of the currently selected display language, or how or when
2 such language was selected - prior to the user actuation of any particular such key
3 (Col. 1, lines 33-48; Col. 3, lines 50-65 of Akpa). This is not the same as the subject
4 matter as recited by instant claim 22, as amended.

5 In any event, Akpa fails to provide at least a processor configured to associate
6 an input point signal from an input point with a corresponding description of the input
7 point in a preselected one of the plurality of languages and to display the description
8 on the display, wherein such an input point signal originates from one of a plurality of
9 user-accessible input points configured to generate input point signals in response to
10 being accessed by a user, and wherein the processor is further configured to
11 perform the association in response to the input point signal, as positively recited in
12 combination with the other features and limitations of instant claim 22, as amended.
13 Thus, the Applicant asserts that the § 102 rejection of claim 22 is improper and
14 should be withdrawn.

15 For at least the foregoing reasons, the Applicant asserts that claim 22, as
16 amended, is allowable.

17 18 Rejection of Claims under 35 U.S.C. § 103

19 Claims 1-4, 8, 11, and 18-20 have been rejected under 35 U.S.C. § 103(a) as
20 being unpatentable over Akpa in view of JP11053941 ("Matsuda"). Claim 5 has
21 been rejected under 35 U.S.C. § 103(a) as being unpatentable over Akpa in view of
22 Matsuda, in further view of U.S. Patent No. 5,007,008 ("Beers"). Claim 10 has been
23 rejected under 35 U.S.C. § 103(a) as being unpatentable over Akpa in view of
24 Matsuda, in further view of U.S. Patent No. 5,768,142 ("Jacobs"). Claims 12-16
25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Akpa in
view of Matsuda, in further view of U.S. Patent No. 6,507,352 ("Cohen").

1 Claim 17 has been rejected under 35 U.S.C. § 103(a) as being unpatentable
2 over Akpa in view of Matsuda and Cohen, and in further view of U.S. Patent No.
3 5,790,652 ("Gulley"). Claims 21 and 24 have been rejected under 35 U.S.C. §
4 103(a) as being unpatentable over Akpa, in view of U.S. Patent No. 6,108,200
5 ("Fullerton"). Claim 23 has been rejected under 35 U.S.C. § 103(a) as being
6 unpatentable over Akpa in view of Gulley.

7 The Applicant respectfully disagrees that claims 1-5, 8, 10-21 and 23-24, as
8 respectively amended, are unpatentable as respectively rejected under 35 U.S.C.
9 § 103(a).

10 As a starting point, MPEP 706.02(j) states:

11 "[t]o establish a *prima facie* case of obviousness, three basic criteria must be
12 met. First, there must be some suggestion or motivation, either in the cited
13 references themselves or in the knowledge generally available to one of ordinary
14 skill in the art, to modify the reference or to combine the reference teachings.
15 Second, there must be a reasonable expectation of success. **Finally, the prior art**
16 **reference (or references when combined) must teach or suggest all the claim**
17 **limitations.** The teaching or suggestion to make the claimed combination and the
18 reasonable expectation of success must both be found in the prior art and not based
19 on applicant's disclosure." (Emphasis added.).

20 Claims 2-5, 8 and 10 depend from claim 1, as amended. Claims 12-17
21 depend from claim 11, as amended. Claims 19-20 depend from claim 18, as
22 amended. Claim 23 depends from claim 22, as amended. It is axiomatic that any
23 claim depending (directly or indirectly) from an allowable base claim is also
24 allowable. Therefore, the Applicant provides the following arguments in support of
25 the allowability of independent claims 1, 11, 18, 21 and 24, as respectively amended,
as the Applicant does not believe it necessary to provide arguments in favor of each
and every dependent claim.

1 The Applicant believes that claim 23 is allowable at least by virtue of its
2 dependence from allowable independent claim 22, as amended, as well as for its
3 own respectively patentable features and limitations.

4
5 Claim 1

6 The Applicant asserts that claim 1, as amended (and claims 2-5, 8 and 10 that
7 depend therefrom), are allowable. In regard to claim 1, as amended, that claim
8 includes the following features and limitations:

9
10 A document processing apparatus comprising:

11 a single display;

12 a plurality of user-accessible input points configured to generate
13 input point signals in response to being accessed by a user, wherein
14 the display is distinct from any of the plurality of user-accessible input
15 points;

16 an electronic readable memory device comprising descriptions
17 of selected ones of the plurality of user-accessible input points in a
18 plurality of languages;

19 a processor configured to associate an input point signal from
20 an input point with a corresponding description of the input point in a
21 preselected one of the plurality of languages and thereafter to display
22 the description on the display for a preselected time, wherein the
23 processor is further configured to perform the association in response
24 to the input point signal; and

25 an electronic timer in communication with the processor, the
electronic timer configured to determine time duration.

(Emphasis added.)

1 It is important to note that the elements and limitations recited by claim 1 are
2 respectively and cooperatively configured so that the following usage sequence is
3 performed, in order:

- 4 1) a user accesses a particular input point;
- 5 2) that input point generates a corresponding input point signal;
- 6 3) the processor associates that input point signal with a corresponding
7 description; and
- 8 4) that description is displayed to the user.

9 Thus, under instant claim 1 (as amended), an assertive act is required on the
10 part of the user, in conjunction with a particular input point, prior to (i.e., in order to
11 trigger, or cause) the association and display of the corresponding description for
12 that input point. In the interest of further understanding, the Examiner is respectfully
13 referred to page 15, line 3 to page 18, line 22 of the Specification, and Figs. 5A-5B of
14 the Drawings as respectively originally filed.

15 Akpa fails to teach or suggest a plurality of **user-accessible input points**
16 configured to **generate input point signals** in response to being **accessed by a**
17 **user**, and **a processor configured to associate an input point signal** from an input
18 **point with a corresponding description** of the input point in a preselected one of
19 **the plurality of languages and thereafter to display the description on the display**
20 **for a preselected time, wherein the processor is further configured to perform the**
21 **association in response to the input point signal**, as recited in combination with
22 the other features and limitations of claim 1, as amended.

23 Rather, Akpa teaches that the language-changeable labels for all keys (32-42)
24 are simultaneously displayed to a user prior to making any usage choice regarding,
25 or access to, those keys (Col. 1, lines 33-48; Col. 3, lines 50-65 of Akpa). Put
another way, Akpa is directed to ensuring that a user has the full informational
benefit of all available key (32-42) labeling (in the presently selected language) prior

1 to making a usage choice of any one or more of those keys. This is not the same as
2 the subject matter as recited by claim 1, as amended.

3 In any case, Akpa fails to teach or suggest a processor configured to
4 associate an input point signal from an input point with a corresponding description
5 of the input point in a preselected one of the plurality of languages and thereafter to
6 display the description on the display for a preselected time, wherein the processor
7 is further configured to perform the association in response to the input point signal,
8 as positively recited by claim 1, as amended.

9 Matsuda fails to cure the deficiencies of Akpa. Specifically, Matsuda fails to
10 teach or suggest a plurality of **user-accessible input points** configured to **generate**
11 **input point signals** in response to being **accessed by a user**, and a processor
12 configured to **associate an input point signal** from an input point with a
13 **corresponding description** of the input point in a preselected one of the plurality of
14 languages and **thereafter to display the description on the display** for a
15 preselected time, wherein the processor is further configured to perform the
16 association **in response to the input point signal**, as recited in combination with
17 the other features and limitations of claim 1, as amended.

18 Rather, Matsuda is directed to a timer function for shutting down an electronic
19 display within a portable telephone in the interest of battery conservation (Abstract of
20 Matsuda). In any event, Matsuda fails to teach or suggest a processor configured to
21 associate an input point signal from an input point with a corresponding description
22 of the input point in a preselected one of the plurality of languages and thereafter to
23 display the description on the display for a preselected time, wherein the processor
24 is further configured to perform the association in response to the input point signal,
25 as positively recited by claim 1, as amended.

There is no way to select elements from Akpa, and then to somehow combine
those elements with other elements selected from Matsuda, in order to arrive at the

1 subject matter as recited by claim 1, as no possible combination of Akpa and
2 Matsuda teaches or suggests all of the necessary elements and limitations of
3 claim 1, as amended. In view of the foregoing deficiencies of Akpa and Matsuda,
4 and in further view of the requirements recited by MPEP 706.02(j) and MPEP
5 2143.03, the § 103 rejection of claim 1, as amended, is unsupportable and should be
6 withdrawn.

7 The Examiner is respectfully reminded of the duty to consider the subject
8 matter of each claim as a whole, and not as a mere recitation of discrete and
9 disarticulated elements and limitations (MPEP 2141.02, et seq.). For example, the
10 user-accessible input points, the processor, and the display are respectively
11 configured in both individual *and* cooperative aspects so as to perform as recited by
12 claim 1, as amended. Thus, there is specific synergy to the subject matter recited by
13 claim 1 (as amended) that is neither taught nor suggested by the prior art of record –
14 whether these particular cited references be considered alone, or in any
15 combination.

16 For at least the foregoing reasons, the Applicant asserts that claim 1, as
17 amended, is allowable. It is axiomatic that any claim depending (directly or
18 indirectly) from an allowable base claim is also allowable. Therefore, the Applicant
19 asserts that claims 2-5, 8 and 10 are also allowable at least by virtue of their
20 dependence (direct or indirect) from allowable independent claim 1 (as amended), as
21 well for their own respectively patentable features and limitations.

22 23 Claim 11

24 The Applicant asserts that claim 11, as amended (and claims 12-17 that
25 depend therefrom), are allowable. In regard to claim 11, as amended, that claim
includes the following features and limitations:

1 A method for displaying local language descriptions of a plurality
2 of user accessible input points of a document processing apparatus,
3 comprising:

4 providing a single electronic display distinct from any of the
5 plurality of user-accessible input points;

6 providing, on a machine readable medium and in the local
7 language, a plurality of descriptions of user input points corresponding
8 to the plurality of user accessible input points; and

9 in response to a user accessing an input point, determining a
10 time duration of an input signal for the input point the user is
11 accessing, and upon expiration of the time duration, accessing the
12 local language description of the user input point which corresponds to
13 the user input point, and thereafter displaying to the user the local
14 language description of the user input point using the electronic
15 display.

16 (Emphasis added).

17
18 Akpa fails to teach or suggest a method including, in response to a **user**
19 **accessing an input point**, determining a time duration of an input signal for the
20 input point the user is accessing, **and upon expiration of the time duration,**
21 **accessing the local language description of the user input point which**
22 **corresponds to the user input point, and thereafter displaying** to the user the
23 **local language description of the user input point** using the electronic display, as
24 recited in combination with the other features and limitations of claim 11, as
25 amended.

 Under claim 11 (as amended), a method is provided wherein the following
steps are performed, in order: 1) a user accesses a user input point; 2) a local

1 language description corresponding to that user input point is then accessed, and 3)
2 that description is displayed to the user. That is, user access of a user input point is
3 required prior to (in order to initiate) displaying the corresponding description of that
4 user input point to the user. Akpa fails to teach or suggest any method inclusive of
5 the particular steps, executed in the particular order, as recited by claim 11, as
6 amended. The Examiner is generally referred to the arguments provided above in
7 regard to instant claim 1 and 22 with respect to the particular teachings of Akpa.

8 Matsuda fails to cure the deficiencies of Akpa. Specifically, Matsuda fails to
9 teach or suggest any method including, in response to a **user accessing an input**
10 **point, determining a time duration of an input signal for the input point the user is**
11 **accessing, and upon expiration of the time duration, accessing the local**
12 **language description of the user input point which corresponds to the user**
13 **input point, and thereafter displaying** to the user the **local language description**
14 **of the user input point** using the electronic display, as recited in combination with
15 the other features and limitations of claim 11, as amended. As argued above,
16 Matsuda is directed to a timer function for conserving battery power within a portable
17 phone. Neither Akpa nor Matsuda teach or suggest method elements as recited by
18 claim 11, as amended.

19 More to the point, there is no way to select elements from Akpa, and then to
20 somehow combine those elements with other elements selected from Matsuda, in
21 order to arrive at the instant invention as recited by claim 11, as amended, as no
22 possible combination of Akpa and Matsuda teaches or suggests all of the necessary
23 limitations. In view of the foregoing deficiencies of Akpa and Matsuda, and in further
24 view of the requirements recited by MPEP 706.02(j) and MPEP 2143.03, the § 103
25 rejection of claim 11, as amended, is unsupportable and should be withdrawn.

For at least these reasons, the Applicant asserts that claim 11, as amended,
is allowable. As claims 12-17 depend (directly or indirectly) from claim 11 (as

1 amended), it is axiomatic that they too are also allowable at least by virtue of their
2 dependence from allowable claim 11, as amended, as well as for their own
3 respectively patentable features and limitations.

4
5 Claim 18

6 The Applicant asserts that claim 18, as amended (and claims 19-20 that
7 depend therefrom), are allowable. In regard to claim 18 (as amended), that claim
8 includes the following features and limitations:

9
10 A document processing apparatus comprising:

11 a single display;

12 a plurality of user-accessible input points configured to generate
13 input point signals in response to being accessed by a user, wherein
14 the display is distinct from any of the plurality of user-accessible input
15 points;

16 an electronic readable memory device comprising descriptions
17 of selected ones of the plurality of user-accessible input points in a
18 local language;

19 a processor configured to associate an input point signal from
20 an input point with a corresponding description of the input point in the
21 local language and thereafter to display the description on the display,
22 wherein the processor is further configured to perform the association
23 in response to the input point signal; and

24 an electronic timer in communication with the processor, the
25 electronic timer configured to determine time duration.

(Emphasis added.)

1 Thus, the elements and limitations as recited by claim 18, as amended, are
2 respectively and cooperatively configured such that the following usage sequence is
3 performed, in order: 1) a user accesses a user-accessible input point; 2) that input
4 point generates a corresponding input point signal; 3) the processor associates that
5 input point signal with a corresponding description; and 4) that description is
6 displayed to the user. Thus, under instant claim 18 (as amended), an assertive act
7 is required of the user prior to displaying the corresponding description for a
8 particular input point.

9 Akpa, on the other hand, fails to teach or suggest a plurality of user-
10 accessible input points configured to generate input point signals in response to
11 being accessed by a user, and a processor configured to associate an input point
12 signal from an input point with a corresponding description of the input point in
13 the local language and thereafter to display the description on the display,
14 wherein the processor is further configured to perform the association in response
15 to the input point signal, as recited in combination with the other features and
16 limitations of claim 18, as amended. Again, Akpa is directed to *simultaneously*
17 *displaying all* key labels to a user – by way of the requisite and complex multi-LCD
18 or overlay-and-LCD structure - prior to user actuation of a particular key or button.
19 This is not the same as the subject matter as recited by claim 18, as amended.

20 Matsuda fails to cure the deficiencies of Akpa. Specifically, Matsuda fails to
21 teach or suggest a plurality of user-accessible input points configured to generate
22 input point signals in response to being accessed by a user, and a processor
23 configured to associate an input point signal from an input point with a
24 corresponding description of the input point in the local language and thereafter
25 to display the description on the display, wherein the processor is further
configured to perform the association in response to the input point signal, as

1 recited in combination with the other features and limitations of claim 18, as
2 amended.

3 There is no way to select elements from Akpa, and then to somehow
4 combine those elements with other elements selected from Matsuda, in order to
5 arrive at the instant invention as recited by claim 18 (as amended), as no possible
6 combination of Akpa and Matsuda teaches or suggests all of the necessary
7 limitations. In view of the foregoing deficiencies of Akpa and Matsuda, and in further
8 view of the requirements recited by MPEP 706.02(j) and MPEP 2143.03, the § 103
9 rejection of claim 18, as amended, is unsupportable and should be withdrawn.

10 For at least these reasons, and for reasons substantially analogous to those
11 argued above in regard to claims 1, 11 and 22, the Applicant asserts that claim 18,
12 as amended, is allowable. It is axiomatic that claims 19-20 are also allowable at
13 least by virtue of their dependence (directly or indirectly) from allowable independent
14 claim 18 (as amended), as well as for their own respectively patentable features and
15 limitations.

16
17 Claim 21

18 The Applicant asserts that claim 21, as amended, is allowable. In regard to
19 claim 21 (as amended), that claim includes the following features and limitations:

20
21 A document processing apparatus, comprising:
22 a single display;
23 a plurality of user-accessible input points configured to generate
24 input point signals in response to being accessed by a user, wherein
25 the display is distinct from any of the plurality of user-accessible input
points;

1 an electronic readable memory device comprising descriptions
2 of selected ones of the plurality of user-accessible input points in a
3 plurality of languages;

4 a processor configured to associate an input point signal from
5 an input point with a corresponding description of the input point in a
6 preselected one of the plurality of languages and thereafter to display
7 the description on the display for a preselected time;

8 [...].

9 (Emphasis added.)

10
11 The elements and limitations as recited by claim 21 (as amended) are
12 respectively and cooperatively configured such that: 1) a user is required to access
13 (i.e., actuate) a particular input point, in order to 2) cause the display of the
14 description corresponding to that input point. This is not the same as *any* of the
15 teachings or suggestions of Akpa.

16 More specifically, Akpa fails to teach or suggest a plurality of *user-*
17 *accessible input points* configured to *generate input point signals* in response to
18 being *accessed by a user*, and a processor configured to associate *an input point*
19 *signal* from an input point with a *corresponding description* of the input point in a
20 preselected one of the plurality of languages and to *thereafter* to *display the*
21 *description on the display* for a preselected time, as recited in combination with
22 the other features and limitations of claim 21, as amended.

23 Fullerton fails to cure the deficiencies of Akpa. In particular, Fullerton fails to
24 teach or suggest a plurality of *user-accessible input points* configured to *generate*
25 *input point signals* in response to being *accessed by a user*, and a processor
configured to associate *an input point signal* from an input point with a
corresponding description of the input point in a preselected one of the plurality of

1 languages and to *thereafter* to *display the description on the display* for a
2 preselected time, as recited in combination with the other features and limitations of
3 claim 21, as amended.

4 Rather, Fullerton is directed to a portable, foldable keyboard designed to
5 interface with a personal digital assistant (PDA) (Abstract of Fullerton). Fullerton is
6 not directed to providing descriptions corresponding to user-accessible input points
7 in any way, or for any purpose. In fact, Fullerton is completely devoid of the terms
8 "description", "label" or any of their respective equivalents, in any context analogous
9 to the subject matter of claim 21, as amended.

10 There is no way to select elements from Akpa, and then to somehow combine
11 those elements with other elements selected from Fullerton, in order to arrive at the
12 instant invention as recited by claim 21 (as amended), as no possible combination of
13 Akpa and Matsuda teaches or suggests all of the necessary limitations. In view of
14 the foregoing deficiencies of Akpa and Matsuda, and in further view of the
15 requirements recited by MPEP 706.02(j) and MPEP 2143.03, the § 103 rejection of
16 claim 21, as amended, is unsupportable and should be withdrawn.

17 For at least these reasons, and for reasons substantially analogous to those
18 argued above in regard to claims 1, 11, 18 and 22, the Applicant asserts that claim
19 21, as amended, is allowable.

21 Claim 24

22 The Applicant asserts that claim 24, as amended, is allowable. In regard to
23 claim 24 (as amended), that claim includes the following features and limitations:

24
25 A document processing apparatus, comprising:
a single display;

1 a plurality of user-accessible input points configured to generate
2 input point signals in response to being accessed by a user, wherein
3 the display is distinct from any of the plurality of user-accessible input
4 points;

5 an electronic readable memory device comprising descriptions
6 of selected ones of the plurality of user-accessible input points in a
7 plurality of languages;

8 a processor configured to associate an input point signal from
9 an input point with a corresponding description of the input point in a
10 preselected one of the plurality of languages and thereafter to display
11 the description on the display for a preselected time, wherein the
12 processor is further configured to perform the association in response
13 to the input point signal; and

14 [...].

15 (Emphasis added.)

16
17 As argued above, Akpa fails to teach or suggest a plurality of **user-**
18 **accessible input points** configured to **generate input point signals** in response to
19 being **accessed by a user**, and a processor configured to **associate an input point**
20 **signal** from an input point with a **corresponding description** of the input point in a
21 preselected one of the plurality of languages and **thereafter to display the**
22 **description on the display** for a preselected time, wherein the processor is further
23 configured to perform the association **in response to the input point signal**, as
24 recited in combination with the other features and limitations of claim 24, as
25 amended.

 Fullerton fails to cure the deficiencies of Akpa. In particular, Fullerton fails to
teach or suggest a plurality of **user-accessible input points** configured to **generate**

1 input point signals in response to being accessed by a user, and a processor
2 configured to associate an input point signal from an input point with a
3 corresponding description of the input point in a preselected one of the plurality of
4 languages and thereafter to display the description on the display for a
5 preselected time, wherein the processor is further configured to perform the
6 association in response to the input point signal, as recited in combination with
7 the other features and limitations of claim 24, as amended.

8 There is no way to select elements from Akpa, and then to somehow combine
9 those elements with other elements selected from Fullerton, in order to arrive at the
10 instant invention as recited by claim 24, as amended, as no possible combination of
11 Akpa and Matsuda teaches or suggests all of the necessary limitations. In view of
12 the foregoing deficiencies of Akpa and Matsuda, and in further view of the
13 requirements recited by MPEP 706.02(j) and MPEP 2143.03, the § 103 rejection of
14 claim 24, as amended, is unsupportable and should be withdrawn.

15 For at least these reasons, and for reasons substantially analogous to those
16 argued above at least in regard to claims 1 and 21, the Applicant asserts that claim
17 24 (as amended) is allowable.

18 19 Summary

20 The Applicant believes that this response constitutes a full and complete
21 response to the Office Action dated August 26, 2005. Therefore, the Applicant
22 respectfully requests reconsideration on the merits of claims 1-5, 8, and 10-24, as
23 respectively amended, in favor of timely allowance.

24
25 (Continued on next page.)

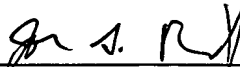
1 The Examiner is respectfully requested to contact the below-signed
2 representative if the Examiner believes this will facilitate prosecution toward
3 allowance of the claims.

4
5 Respectfully submitted,

6 William L. CORNELIUS

7
8 Date: October 27, 2005

By



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